



Cory A. Booker
Mayor



Julien X. Neals
Corporation Counsel

Department of Law

May 11, 2010

Via ECF

Hon. Patty Shwartz, U.S.M.J.
UNITED STATES DISTRICT COURT
50 Walnut Street, Courtroom PO-10
Newark, NJ 07101

Re: George Tillery v. City of Newark, et al.
Civ. No. 09-4696 (FSH) (PS)

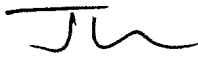
Dear Judge Shwartz:

For Your Honor's reference during the telephone status conference scheduled for this morning, I am enclosing copies of the following documents: (i) plaintiff's interrogatories to the City of Newark defendants; and (ii) Affidavit of Service pertaining to defendant Neil Minovich.

Respectfully submitted,

JULIEN X. NEALS
Corporation Counsel

By: _____


JOHN B. NANCE
Assistant Corporation Counsel

c: Harvey Rothman, Esq. (via ECF)
John Burke, Esq. (via ECF)

**Plaintiffs First Set of Interrogatories as to City of Newark, Michael Santiago,
Ronald Salahuddin, Lt. Minovich and Michael Grainger**

1. Set forth the names and addresses of all proposed expert witnesses whom you expect to call a trial, and has to each, attach true and exact copies of the entire report or reports rendered.

2. State the name, address and position of all persons who have any knowledge of relevant facts pertaining to this case.

3. Identify any and all individuals who made any complaints, at any time, prior to March 2007, regarding drug activity involving plaintiff's store on Clinton Avenue.

4. Describe in detail the nature of the City of Newark's relationship with Counter-Tech Investigations, Trigon Investigations or other private investigators.

5. Do you admit that there was no search warrant for plaintiff's store prior to search conducted on March 9, 2007?

6. Identify any and all partners or other officers who at any time reported to Lt Minovich between 1999 and 2009.

7. Please supply a complete record of internal affairs and citizens complaints made to the City of Newark Re: Lt. Minovich, Michael Grainger, Michael Santiago and any other partners or subordinates to Minovich. List complaint numbers and full information.

8. Please advise the outcome of any investigation regarding the parties mentioned in question seven.

9. What was the purpose of the raid at plaintiff's store on March 9, 2007?
10. Identify all officers working on patrol within a two-mile radius of plaintiff's store or home as detailed in plaintiff's answers to interrogatories. Who authorized same?
11. Please supply any and all correspondence and/or complaints from plaintiff or any prior attorneys regarding harassment by Lt. Minovich or any other police officers over a 10-year period.
12. Detail any training any officers have received in constitutional law from the City of Newark.

13. Does the City of Newark have a written or unwritten policy or custom regarding the obtaining of search warrants?

14. Does the City of Newark have a written or unwritten policy or custom regarding the investigation or discipline of police officers through its internal affairs department?

15. Please supply any information you have as to the federal investigation and/or indictment of former deputy mayor Ron Salahuddin..

16. Was Deputy Mayor Ron Salahuddin specifically assigned to accompany police raids and/or searches?

17. State whether any of the police officers named in the complaint has been a defendant in any civil action arising out of purported constitutional violations?

18. Please supply the name of every individual police officer involved in the March 2007 raid on plaintiff's establishment and every civilian involved in same.

19. Have any entries into plaintiff's residence ever been approved by anyone at any time, and if so, were warrants issued? If so, what was the probable cause?

20. What became of any money, tangible goods, sneakers, perfume, or cigarettes confiscated from plaintiff's store at any time, including, but not limited to March 7, 2007?

CERTIFICATION

I hereby certify that the copies of documents annexed hereto, if any, are exact copies of the documents in my possession and that I have not altered, or caused to be altered, the originals. I am unaware of the existence of other or ancillary documents not annexed hereto that would be responsive to the information sought herein.

I certify that the foregoing statements and answers to Interrogatories are made by me and are true. I am aware that if any of the foregoing statements or answers made by me are willfully false, I am subject to punishment.

Dated: _____

RETURN OF SERVICE		
Service of the Summons and complaint was made by me (I)	DATE	11/6/09
NAME OF SERVER (PRINT) KARL RYANS	TITLE	INVESTIGATOR
Check one box below to indicate appropriate method of service		
<p>Served personally upon the defendant. Place where served: <u>254 W. BEGELOW ST</u> <u>NEWARK 5TH PRESENT</u></p> <p>Left copies thereof at the defendant's dwelling house or usual place of abode with a person of suitable age and discretion then residing therein.</p> <p>Name of person with whom the summons and complaint were left: <u>GRAINSON</u></p> <p>Returned unexecuted: <u>in letter to Mr. Minnick.</u></p> <p>Other (specify): _____</p>		
STATEMENT OF SERVICE FEES		
TRAVEL	SERVICES	TOTAL
DECLARATION OF SERVER		
<p>I declare under penalty of perjury under the laws of the United States of America that the foregoing information contained in the Return of Service and Statement of Service Fees is true and correct.</p> <p>Executed on <u>11/6/09</u> Date</p> <p style="text-align: right;"> <u>Karl Ryans</u> Signature of Server <u>218 N. WOOD AVE LINDEN, NJ</u> Address of Server <u>07036</u> </p>		